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10 Attorneys for Plaintiff
11 KARL FINLEY

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

16 KARL FINLEY

17 Plaintiff,

18 v.

19 COUNTY OF MARIN and DOES 1 through 50,
20 inclusive,

21 Defendants.

Case No.: C07-5922 EMC

[PROPOSED] STIPULATED ORDER
ALLOWING COUNTY OF MARIN TO FILE
AMENDED ANSWER

22 IT IS HEREBY STIPULATED by and between the parties to allow the County of Marin to file
23 an amended answer to add affirmative defenses in this action.
24

25 There is good cause for the stipulation to allow the County of Marin to file and amended
26 answer as follows:

27 The parties and a subpoenaed third party encountered a discovery dispute regarding various
28 documents. The County of Marin alleged privilege in those documents, and claimed the documents

1 were not relevant to this action because the County of Marin had not claimed any affirmative defenses
2 related to its investigation conducted in connection to the allegations of discrimination and harassment
3 by Plaintiff. As part of a meet and confer agreement, the parties agreed to allow disclosure of the
4 documents conditioned on the ability of the County of Marin to file an amended answer to assert
5 additional affirmative defenses.

6 The parties are not making this request for any improper purpose. Instead, the parties agree
7 that judicial economy will be served if this request is granted. Moreover, neither party would suffer
8 any prejudice as the parties have stipulated to this request.

9
10 SO STIPULATED.

11 Dated: May 12, 2009

PATRICK K. FAULKNER

COUNTY COUNSEL

13
14 By:



Stephen R. Raab
Attorney for Defendants

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16
17 Dated: May 1, 2009

KAHN BROWN & POORE LLP

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19 By:



Scott Brown
Attorney for Plaintiff

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1 **PROPOSED ORDER**
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4 THE COURT HEREBY ORDERS AS FOLLOWS:
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6 The parties' request that the County of Marin be allowed to file an amended answer is granted.
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8 SO ORDERED
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10 DATED: May 29, 2009
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